

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

SARAH TONEY,)	
)	
Plaintiff,)	NO. 1:13-CV-00042
)	
v.)	
)	
QUALITY RESOURCES, INC., <i>et al.</i>)	Hon. John F. Grady
)	
Defendants.)	

DEFENDANT SEMPRIS, LLC'S INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Sempris, LLC ("Sempris"), by its counsel, hereby serves Sempris' Initial Disclosures. Sempris makes these disclosures based on the information now reasonably available. Sempris' investigation is ongoing, and Sempris expressly reserves the right to amend or supplement its disclosures as permitted by Rule 26(a)(1).

A. Individuals Likely to Have Discoverable Information.

The following individuals are likely to have discoverable information that Sempris may use to support its claims or defenses:

1. Michael McGowan, Senior Vice President of Marketing and Chief Marketing Officer, Sempris, LLC.

10900 Wayzata Boulevard
Minneapolis, Minnesota 55305

Mr. McGowan should be contacted through counsel, Jenner & Block: (312) 222-9350

Subject(s): General knowledge of relevant company policies; relevant company marketing.

2. Thomas Cavalli, Chief Financial Officer, Sempris, LLC

10900 Wayzata Boulevard
Minneapolis, Minnesota 55305

Mr. Cavalli should be contacted through counsel, Jenner & Block: (312) 222-9350.

Subject(s): Asset sale by Provell, Inc. to Sempris, LLC; corporate distinction between Provell, Inc. and Sempris, LLC; assignment of Provell, Inc.'s contract with Quality Resources to Sempris, LLC.

3. Quality Resources, Inc.

c/o Greenspoon Marder, P.A.
200 East Broward Boulevard
Suite 1500
Fort Lauderdale, FL 33301

Subject(s): Business relationships with defendants in this matter.

4. Sarah Toney.

1900 S. Prairie Avenue, Coach House
Chicago, IL 60616

Subject(s): Business relationships with defendants in this matter; circumstances of calls allegedly made to Plaintiff; goods and services marketed during the alleged calls.

B. Documents, Electronically Stored Information, and Tangible Things.

Sempris's investigation continues. At the present time, based on Sempris' current state of knowledge, the following are categories of documents, electronically stored information, and tangible things that are in the possession, custody, or control of Sempris, which may be used to support Sempris' claims or defenses, all of which are located at Sempris' principal place of business, 10900 Wayzata Boulevard, Minneapolis, Minnesota:

1. Sempris's contract with Quality Resources.
2. Asset Purchase Agreement between Provell, Inc. and Sempris, LLC.

Sempris reserves and does not waive its right to supplement this disclosure as additional

information is learned.

C. Damages. Sempris is not seeking damages at this time, but reserves all rights.

D. Insurance. The following insurance policies may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment, and will be made available for inspection and copying subject to protective order:

RSUI Indemnity Company, Policy No. NHP650549

Dated: August 16, 2013

JENNER & BLOCK LLP
Attorneys for Sempris, LLC

By /s/ Matthew R. Devine

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Chicago, Illinois 60654
(312) 222-9350

CERTIFICATE OF SERVICE

I certify that I caused the foregoing Defendant Sempris, LLC's Initial Disclosures to be served on all counsel of record by filing a true and correct copy with the Clerk of Court using the CM/ECF system on August 16, 2013.

/s/ Matthew R. Devine